

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

MV3 PARTNERS LLC,

Plaintiff,

v.

ROKU, INC.,

Defendant.

Civil Action No.: W-6:18-cv-00308-ADA

**JURY TRIAL DEMANDED**

**Roku, Inc.'s Proposed Voir Dire Questions**

ROKU, INC. (Roku") submits the following proposed questions to be asked by Court during Voir Dire:

1. Are you familiar with any of the parties, witnesses or law firms on the list of parties, witnesses and counsel?
  - a. If so, who? How are you familiar with them?
2. After completing the questionnaire, have you done any internet research or other searching for information about either MV3 Partners or Roku?
  - a. If so, what did you do and what did you learn?
3. How many of you subscribe to or regularly read the Waco Tribune-Herald?
4. How many of you have read or seen something in the media about this case, MV3 or Roku?
5. Have you ever had an experience in which you felt someone used an idea you had without your permission?
  - a. If "Yes," please describe what happened.
6. Have you ever served in a focus group or as a mock juror that was related to patents?
7. Have you ever served on a mock jury or focus group that was related to any consumer electronics?
8. Please describe any knowledge of or experience you have with patents.
9. Who here has any familiarity with how the US Patent system works?
10. What does the phrase streaming media mean to you?
11. If you have owned a Roku Player or Roku TV, did you have any problems or complaints with the device?
  - a. If "Yes," please describe the problem and how it was resolved.
12. Many of you have stated that you have used a streaming device other than a Roku, such as Google Chromecast, Apple TV, or Amazon Fire Tv; which brands have you used?
13. Many of you stated you have owned a smart TV; which brands of smart TV have you owned?

14. Do you use any streaming media such as Netflix, Amazon, Pandora, Apple TV, YouTube TV, Hulu, HBO Go, Disney Plus, ESPN+, or CBS All Access.?
  - a. If "Yes," please describe any complaints you have with these streaming services and how they were addressed.
15. How many of you have started watching either Netflix or a YouTube video on your phone and while watching switched to watching it on your TV?
16. Have you ever used a mobile computer, such as your phone, for screen mirroring to a monitor or television?
  - a. If you have, what devices have you used to do this?
17. Who here would be so distracted by concerns regarding the coronavirus pandemic or current economic conditions caused by the pandemic that you would be unable to give your full attention to a complex business case?
18. Is there any other reason why it would be an undue hardship for you to serve on a case, such as this, involving patents and streaming media technology?

Respectfully submitted,

/s/ Alexander J. Hadjis

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ATTORNEYS FOR  
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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was served on all counsel of record via electronic transmission on September 28, 2020.

/s/ David N. Deaconson